



SURUHANJAYA SYARIKAT MALAYSIA
COMPANIES COMMISSION OF MALAYSIA



ETHICS
ETHICS

INTEGRITY
INTEGRITY

DISCLOSURES
DISCLOSURES

SSM BEST BUSINESS PRACTICE CIRCULAR 3/2012 ON: **ACHIEVING CORPORATE INTEGRITY**

In Collaboration With:



Transparency International - Malaysia

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ACHIEVING CORPORATE INTEGRITY

PREAMBLE

Corporate integrity is essential in setting a concrete foundation for Malaysia's existing and future economic prosperity. In striving to create a Malaysian business environment that is free from destructive elements such as corruption, fraud and economic crime, and in ensuring companies practice integrity in their day to day operations, the Companies Commission of Malaysia (SSM) collaborated with the Corporate Integrity Roundtable Members¹ in the development and dissemination of SSM's third Best Business Practice Circular entitled "**Achieving Corporate Integrity**" (BBPC 3/2012).

This BBPC 3/2012 promotes the Corporate Integrity Pledge (CIP) and Corporate Integrity System Assessment and Questionnaire (CISAQ) which is a formal and concrete expression of commitment by companies to abide by ethical business practices and to support a national campaign against corruption.

The CIP for instance should be signed by corporate leaders to set the "tone from the top" and oblige all members of the organization to likewise behave with integrity and carry on their responsibilities ethically. Any company or organization, local or foreign, big or small may sign it - so long as it commits to reform and operate its business ethically and with integrity.

The BBPC 3/2012 is a guideline which could be used by businesses and companies which have signed the pledge to monitor the company's progression in implementing ethical business practices by way of conducting the CISAQ to identify gaps, so as to enhance and improve their business practices. Though the nature of this document is **voluntary**, the business and corporate communities are encouraged to adopt the suggested best practices, being efforts towards ensuring business viability and sustainability.

¹ refer to paragraph [19] for the list of members.

OBJECTIVES

1. The objectives of this BBPC 3/2012 are:

- To inculcate integrity practices in the corporate sector;
- To promote corporate social responsibility and accountability;
- To widen and strengthen good business ethics;
- To cultivate the creation of ethical environment in the workplace;
- To enhance corporate governance framework by instilling a culture of professional conduct that is free from corruption; and
- To strengthen unity among the different ethnic groups and regions through economic activities.



BACKGROUND

Integrity Defined

2. The word integrity has been given a wide meaning; the most common reference to integrity is consistency in uprightness. Consistency has been identified as the key component in determining an integrity act. As integrity actions refer to alignment between what one does and what one says, it was asserted that doing and saying should belong to the same whole² where a person with integrity is usually seen as being consistent between his actions and what he purports to honor. His upright conduct is made possible through steadfast adherence to unbending principles and standards, and his character has been marked by an undaunted quest for important ends far larger than his own needs, comfort and interest.³
3. Corporate integrity is measured by what a company does or does not do even when no one is looking. Integrity is violated when corporate governance policies and procedures are disregarded in the quest for personal and corporate gain. A company must put in place an ethical working environment where ethical corporate cultures, policies, laws and procedures are followed and enforced.

² Charles E. Watson "Managing with Integrity".
Insights from America's CEO (New York: Praeger, 1991), page 171

³ *ibid*

Integrity as a Priority Agenda in Malaysia

4. The Government of Malaysia has put in place proper mechanisms to reduce corruption in its pursuit towards promoting the practice of higher ethical values through the operationalisation of the National Integrity Plan (NIP) since 23 April 2004. The objective of the NIP is to meet the 4th challenge of Vision 2020 which is to establish a fully moral and ethical society whose citizens are strong in religious and spiritual values and imbued with the highest ethical standards. The NIP outlines recommendation for both the public and private sectors to implement activities and programmes toward enhancing integrity in combating corruption.
5. To facilitate the implementation of the NIP, the Malaysian Institute of Integrity (IIM) was established in 2004. IIM is responsible for the implementation of the NIP and organises seminars and workshops for citizens and companies to encourage involvement in anti-corruption work. SSM served as the secretariat for the various working groups under the leadership of the Ministry of Domestic Trade, Co-operatives and Consumerism to lay out the blueprint for economic institution integrity agenda as set out under the NIP. This blueprint was developed together with five (5) working groups comprised of leaders of corporation, professional bodies and trade groups. The blueprint entitled “Business Ethics: Towards Enhancing Corporate Integrity and Business Ethics: A Practical Guide for Malaysian Companies”⁴ was handed over to IIM’s Board of Directors and duly published by IIM’s Private Sector Division.
6. Under the newly introduced Government Transformation Plan (GTP), which was unveiled on 28 January 2010, the Government aspires to transform the Malaysian economy by way of initiating the National Key Result Areas (NKRAs). One of the initiatives is to reduce corruption in the country by undertaking specific initiatives and monitoring effectiveness of those initiatives by using measures such as the Transparency International Corruption Perceptions Index (TI CPI) and Global Corruption Barometer (GCB) survey. As a result, although the CPI did not improve much in 2011 (going from 4.4 to 4.3), there was an increase in the percentage of respondents to the GCB survey who viewed the Government’s fight against corruption as being effective (from 49% in 2011 vs. 48% in 2010).⁵ This result indicates that the Government’s initiatives that have been put in place are beginning to address the issue of petty corruption, which affects the public in their daily lives.

VISION 2020



⁴ IIM, 2007

⁵ Statement by Datuk Seri Mohamed Nazri Aziz, Minister, Prime Minister's Department, New Straits Times, 1 December 2011"

KEY STATUTORY PROVISIONS THAT PROMOTE INTEGRITY IN THE CORPORATE SECTOR

7. There are several laws administered by various institutions with regulatory powers which are related to corporate integrity through provisions with regards to corporate governance such as the Companies Act 1965 (CA 1965), the Capital Market and Services Act 2007 (CMSA 2007) and the Bursa Listing Requirements.
8. SSM promotes corporate governance by providing the structure, basis and framework of governance that regulates and disciplines companies irrespective of the size and types of companies as provided in the CA 1965. The CA 1965 provides the governance framework for promoting accountability, disclosure and transparency through the relevant provisions⁶ amongst others:
 - Directors' fiduciary duties;
 - Shareholders' rights (including minority share holders) and protections;
 - Disclosure of interests by directors;
 - Integrity of transactions by directors and substantial shareholders;
 - Protection of whistleblowers;
 - Statutory derivative action;
 - Keeping of proper accounting records and financial reporting requirements;
 - Setting up of internal controls mechanism for public companies;
 - Lodgement of certain documents and information to the Registrar for public information; and
 - Civil and criminal enforcement actions.
9. In ensuring integrity and good governance in the capital market industry, the CMSA 2007 that is administered by the Securities Commission (SC) seeks to protect investors and to maintain the integrity of the market for trading of securities and derivatives.
10. Bursa Malaysia Securities Berhad (Bursa) is an exchange holding company approved under Section 15 of the CMSA 2007.⁷ Its Listing Requirements set out the corporate governance requirements that must be complied with by all public listed companies (PLCs) in Malaysia.⁸ Amongst others, the requirements are as follows:
 - Board structure and composition;
 - Rules on related party transactions;
 - Role of board committees;
 - Audit committee;
 - Empowerment of independent directors;
 - Requirement for statement of compliance with the Malaysian Code on Corporate Governance and statement of internal control;
 - Restriction on number of directorships;
 - Directors' education programme; and
 - Financial qualification of signatory to the statutory declaration accompanying the annual audited accounts.
11. Apart from complying with the statutory provisions relating to corporate governance, transparency and mandatory disclosures pursuant to the corporate legislative provisions, companies are also encouraged to participate in the Corporate Integrity Pledge to express their commitment to abide by the non-statutory best practices relating to business ethics and to pledge commitment in adopting the relevant anti-corruption mechanisms in their day to day operations.



⁶ Refer Sections 132(1),(1A)-(1F), 132(20), 181,131, 131A, 131B, 132B, 132C, 132E, 181A-E, 368B, 174(8A), 167, 165, 141 of the CA 1965

⁷ Bursa Malaysia Securities Berhad Overview

⁸ Bursa Malaysia Securities Berhad Listing Requirements Chapter 15



THE CORPORATE INTEGRITY PLEDGE

Circumstances Leading to the Creation of the Corporate Integrity Pledge

12. By way of background, the circumstances surrounding the creation of the Corporate Integrity Pledge (CIP) were as follows:

- The GTP was launched in January 2010. One of the 6 National Key Result Areas (“NKRA” under the GTP was “Fighting Corruption”. One of the initiatives to fight corruption under the NKRA was to implement “**Integrity Pacts**” for **Government contracts**. An Integrity Pact is an agreement between bidders and the Government that there shall be no corruption throughout the contracting process. The Ministry of Finance issued a treasury circular on 1 April 2011, followed by guidelines on 16 December 2011, on Integrity Pacts.
- The Economic Transformation Programme (ETP) was launched in September 2010. Under the ETP, many projects are private sector funded and it was felt that there was a need for a commitment from the private sector to conduct its business in a corruption free manner.
- In December 2010, key **Chambers of Commerce signed an Integrity Pledge with the Malaysian Anti-Corruption Commission (MACC)** to fight corruption. The pledge was intended to get the Chambers to commit to encourage their members to join a fight against corruption.
- In order to complete the spectrum of efforts to fight corruption, the CIP was created in March 2011 for individual companies to pledge to join the fight against corruption by adopting appropriate anti-corruption mechanisms at the company level.



The Pledge

The Five Principles of Anti-Corruption⁹

13. The CIP contains pledges which outline the Anti-Corruption Principles as follows :

COMMITTING to promoting good corporate governance, transparency, accountability and values of integrity

- 1.1 To prohibit bribery and corruption in any form, whether direct or indirect, in the business place and in all business relationships, including with suppliers, contractors, customers and other third parties;
- 1.2 To ensure full compliance with Codes of Ethics at all times; and
- 1.3 To create a positive culture that upholds integrity in order to create a clean business environment.

STRENGTHENING internal systems that support corruption prevention

- 2.1 To develop an anti-corruption programme that articulates values, policies and procedures to be used to prevent corruption from occurring in all business activities;
- 2.2 To improve existing systems and procedures to prevent any corrupt practices;
- 2.3 To include corruption prevention, ethics and integrity as areas for training and development for management, employees and staff; and
- 2.4 To create a secure and accessible channel through which employees and others may report violations in confidence and without risk of reprisal.

COMPLYING with laws, policies and procedures relating to fighting corruption

- 3.1 To ensure that all laws and company policies and procedures relating to fighting corruption are strictly complied with; and
- 3.2 To ensure that the good governance is practised, checks and balances put in place, and business is conducted with transparency and accountability to avoid conflicts of interest, abuses of power and misconduct.

FIGHTING any form of corrupt practice

- 4.1 To take proportionate action against any employee, staff or other person involved in corruption in relation to the business, regardless of position and status; and
- 4.2 To report any corrupt practice that occurs in the business place to the appropriate authority.

SUPPORTING corruption prevention initiatives by the Malaysian Government and MACC

- 5.1 To support anti-corruption efforts by the Government and MACC; and
- 5.2 To maintain relationships with the authorities, regulators and MACC and provide full co-operation in relation to corruption detection, prevention and enforcement of laws against corruption.

The Signing of the Corporate Integrity Pledge

14. The CIP is a document that allows a company to make a commitment to uphold the Anti-Corruption Principles for companies in Malaysia. By signing the pledge, a company is making a unilateral declaration that it will not commit corrupt acts, will work towards creating a business environment that is free from corruption and will uphold the Anti-Corruption Principles for Corporations in Malaysia in the conduct of its business and in its interactions with its business partners and the Government.

15. The CIP is a tool for companies, to encourage them to work on their own anti-corruption programmes and internal systems, and processes. Thus, it helps companies in making their first step towards creating the means to reduce corruption and increase chances of detecting it. It does not change the existing laws or law enforcement infrastructures relating to corruption.

16. The CIP document is available for download at the Corporate Integrity System Malaysia website at <http://www.cism.my/> (CISM website) which is hosted by IIM. Companies can access the website to create an execution copy directly. The standard pledge document provides for execution by company seal, but companies may execute in any other manner as long as it is a valid method of execution for such a document by the company, under the relevant constituent documents and laws pertaining to the company.

⁹ Corporate Integrity Pledge and Anti-Corruption Principles for Corporations in Malaysia 2010



COMMITMENT TO THE PLEDGE

17. By signing the pledge, the company can be listed in the register of signatories in the CISM and IIM's websites and can also be accessed through the websites of SSM, Bursa, MACC, Performance Management and Delivery Unit (PEMANDU), SC, NKRA Corruption Malaysia and TI. Companies that seek to be included on the list of signatories carried on the website can inform IIM by depositing a copy of the executed pledge at its address, through post, fax or email. Once the company has signed the pledge, the company must endorse the Anti-Corruption Principles which sets out principles for companies to adopt to demonstrate their continuous commitment towards creating a business environment that is fair, transparent and free from corruption.

18. The signing of the pledge by a company and the inclusion of any company's name in the list of signatories does not in any way imply that any certification, review or assessment has been conducted by IIM or any of the regulatory authorities or other parties collaborating on this tool to vouch for the integrity of the signatory.

19. The Anti-Corruption Principles, along with the CIP were created as a result of the discussions among:

- Companies Commission of Malaysia
- Malaysian Institute of Integrity
- Performance Management and Delivery Unit (PEMANDU), Prime Minister's Office
- NKRA Corruption Monitoring & Coordination Division
- Malaysian Anti-Corruption Commission
- Bursa Securities Malaysia Berhad
- Transparency International Malaysia
- Securities Commission Malaysia

20. The principles and CIP represent a key nexus between reforms taking place in the public sector and the continued improvements taking place in the private sector, to drive the nation's progress towards becoming a developed nation.

21. The pledge is not a regulatory instrument of any sort. Breach of the pledge e.g. if a signatory company is later found to have been complicit in corruption – will not carry any legal sanction under the pledge on its own. Instead, the pledge will be given force through self-reporting by the company, to meet the demands of its stakeholders, in line with the model adopted under the 10th Principle of the UN Global Compact. Adherence to the pledge is therefore monitored to the same extent that other non-mandated disclosures by any company to its stakeholders are monitored – through scrutiny and demands of the stakeholders.

Once The Pledge Is Signed - What's Next?

22. The signing of the pledge is a manifestation of commitment by the company to observe ethical business practices and to ensure that all its officers carry out their duties responsibly. With renewed allegiance towards upholding business integrity, companies are encouraged to undertake the Corporate Integrity System Assessment Questionnaire to evaluate and measure the level of integrity that is being practised in the day to day operation of the company.

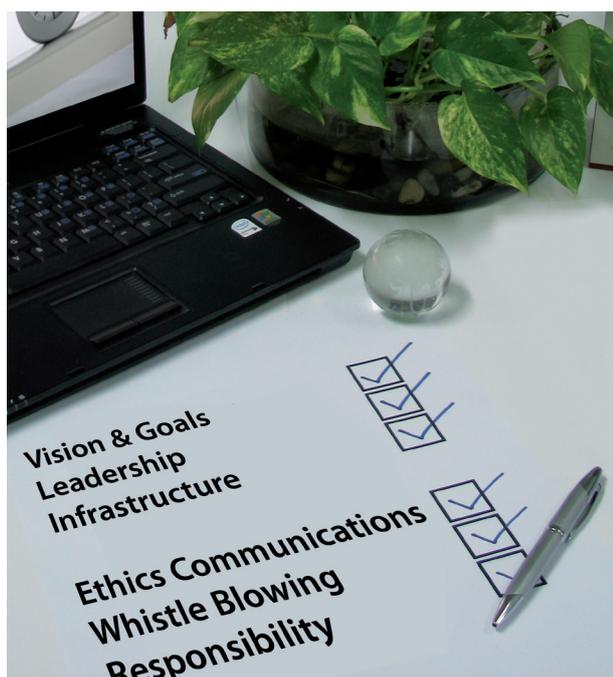


CORPORATE INTEGRITY SYSTEM ASSESSMENT AND QUESTIONNAIRE - A Tool to Assist Companies in Assessing Risks and an Overall Indicator for Companies' Level of Corporate Integrity

23. IIM, in collaboration with its Corporate Integrity Academic Circle (CIAC) have developed The Corporate Integrity System Assessment¹⁰, which is Malaysia's first assessment instrument to assess the twelve dimensions related to corporate integrity. The Corporate Integrity System Assessment and Questionnaire provides companies with a blue print for risk assessment, areas of improvement and a general indicator of the company's corporate integrity. It is a tool for helping companies to assess and measure their progress in making a formal and transparent commitment to ethics and integrity in the workplace.

The Twelve (12) Dimensions of the Corporate Integrity System Assessment and Questionnaire

24. The Corporate Integrity System Assessment instrument is a valuable tool for communicating the company's ability to manage opportunities and risks internally. Through the assessment, opportunities for improvement can be unearthed and help the company to turn them into strategic, organisational and operational advantages. The twelve dimensions in the Corporate Integrity System Assessment are:



(i) **Vision & Goals**

This dimension covers the company's overall concept and approach to ethics and integrity, including its formal articulation of the company's underlying philosophy about ethical and moral conduct, and how these expectations are embedded in the fabric of the company. This benchmark includes how companies identify and define their core ethical values or principles, as well as how companies integrate those values into everyday business conduct.

(ii) **Leadership**

This dimension covers the responsibilities of the company's leadership in shaping, guiding, and supporting the company's ethics and integrity initiatives. It examines how leaders and managers are held accountable for promoting ethics and integrity. This category includes an assessment of the company's "Tone from the Top" at both the senior executive and governance levels.

(iii) **Infrastructure**

This dimension explores the way the company structures or organizes its ethics and integrity function so that it can carry out its goals effectively. This category covers how the ethics function is structured, staffed, and resourced, as well as its formal and informal reporting relationships. This category also includes the roles and responsibilities of those individuals who are assigned to implement the ethics and integrity function.

(iv) **Legal Compliance, Policies & Rules**

This dimension includes core laws, policies, rules, and guidance that comprise the legal framework for the company's ethics and integrity systems. This section assesses the internal framework that provides the floor for ethical behaviour. It also includes compliance with the external legal frameworks within which the company operates. This section includes the systems and controls used to ensure and demonstrate that employees and the company are legally

¹⁰ A Consultative Document on Corporate Integrity System Assessment Questionnaire
Corporate Integrity Systems Malaysia 2010-2012

compliant. Essentially, the company has translated its legal commitments into concrete actionable guidance that is enforceable.

(v) **Organizational Culture**

This dimension deals with the overall company culture and how it promotes mission, vision, structure, and strategy. This section explores the degree to which a company focuses on shaping its company's culture (both written and unwritten rules that dictate how work is performed and goals reached) and whether that culture actively promotes ethical conduct. This section addresses how culture is defined (the history and traditions of the organization), who "owns" and shapes culture, how culture is measured, and the degree to which employees find the culture supportive of ethics and integrity.

(vi) **Disciplinary & Reward Measures**

This dimension attempts to examine how the company sets and enforces its standards for ethical conduct and behaving with integrity. This section also addresses rewards and punishments, incentives that promote ethical behaviour, and disciplinary action taken to limit or punish unethical work conduct. This dimension includes how the company promotes ethical conduct through its performance appraisal process, and whether ethical conduct is linked to compensation and/or other types of non-monetary benefits.

(vii) **Measurement, Research & Assessment**

This section evaluates how ethics and integrity are measured, whether the company undertakes research to support ethics strategies that create a culture of ethics and integrity, and the company's assessment processes around ethics, integrity and company's culture. This category includes the company's commitment to continuous improvement, based on benchmarking and other evaluation methodologies.

(viii) **Confidential Advice & Support**

This section describes how the company provides confidential, neutral, professional and independent ethics advice to employees, supervisors, managers, executives, members of the governing bodies and other stakeholders.

(ix) **Ethics Training and Education**

This section explores ethics and integrity awareness, skill-building training and education, and the integration of such training into the overall development of all employees. This category includes the provision of ethics related training and skill building throughout the life cycle of staff members, and the degree to which these initiatives are integrated into other company training commitments.

(x) **Ethics Communications**

This section describes how the ethics and integrity initiative is articulated and promoted, both internally and externally. This category covers how the company defines its stakeholders and how it gears its key messages to distinct audiences.

(xi) **Whistle blowing**

This section explores how the company encourages individuals (both internal and external to the entity) to speak up and make reports of questionable conduct. This category explores the methods and protections offered to individuals who wish to make the company aware of possible unethical behaviour, misconduct or any illegal actions. It includes the making of both confidential and anonymous reports, and the systems used by the company to protect whistleblowers from retaliation or retribution.

(xii) **Corporate Social Responsibility**

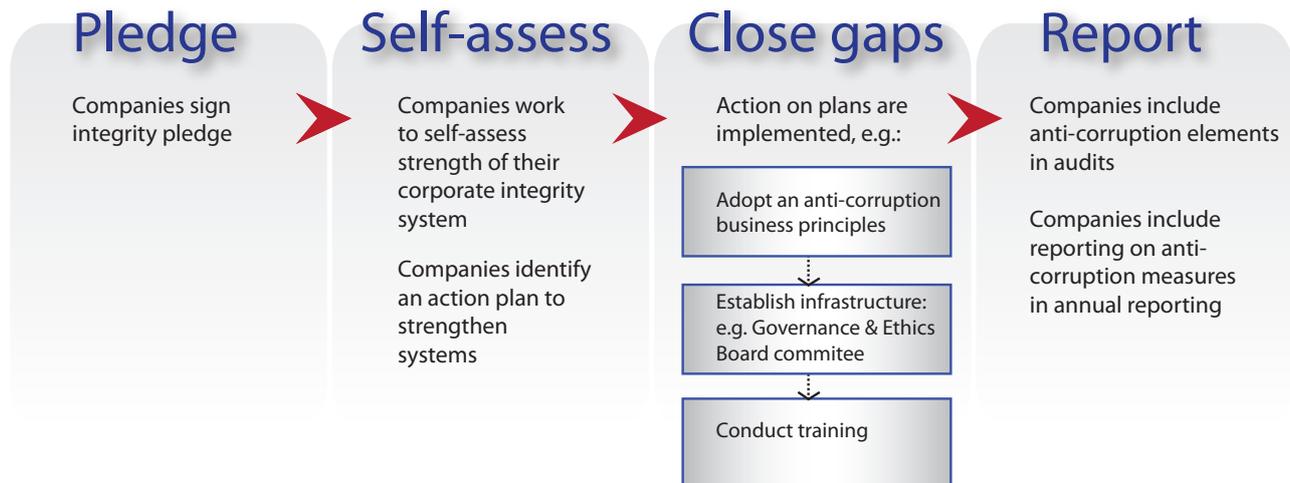
This section covers the company's efforts to establish links with and invest in the communities and stakeholders with which it interacts. This category also covers government relations, environmental consciousness, sustainability, and community impact.

25. Without having a proper measurement to the above assessment, it becomes extraordinarily difficult to ascertain areas of improvement required to achieve the highest level of corporate integrity. To further assist business community in assessing its corporate integrity system, IIM developed a tool which contains 214 questions within the 12 dimensions listed above.

How To Use The Corporate Integrity System Assessment And Questionnaire?

26. This initial version is an adaptation of a global framework entitled “Global Ethics and Integrity Benchmarks” which was developed by Joan Elise Dubinsky and Alan Richter (2008/2009). The questionnaire contained in the Corporate Integrity System Assessment tool is available online at the CISM website and can be used for self-assessment. Companies can contact IIM for further analysis at swasta@iim.com.my.

29. The longer term programme is intended to see companies gradually moving towards self-assessment, identifying gaps and action plans to close them and eventually reporting on anti-corruption measures, in line with the UN Reporting Guidance on the 10th Principle under the Global Compact. The collaborators under this pledge will work together with signatories to develop the action plans on how to take the pledge forward as suggested in the graph below.



27. Upon completing the questionnaire, the result will determine the level of a company’s corporate integrity system; hence allowing companies to put in place a proper mechanism in enhancing its integrity thus encourage better performance and reduce the cost of doing business. Companies with anti-corruption programmes and ethical guidelines are less likely to fall victim to corruption which leads to corporate crime, damage of reputation, lost of business opportunities and lack of trust amongst their employees. Companies who have successfully implemented a corporate integrity system will be able to announce their accomplishment via the CISM website.

28. By undertaking the Corporate Integrity System agenda, companies and policymakers could identify gaps and obstacles pertaining to corporate integrity within the company. With gaps clearly identified, such companies will be able to devise the best strategies and policies to overcome them for example, by attending trainings, workshops or seminars organised by IIM, the Companies Commission of Malaysia Training Academy (COMTRAC), Securities Industry Development Corporation (SIDC), the Malaysia Anti-Corruption Academy and Bursa who can provide technical assistance.

30. For companies that are inclined to begin incorporating an anti-corruption policy in its interactions with its business partners, the Corporate Integrity Agreement is a good way to extend both parties’ commitment. In addition to the declaration of the commitment via the pledge, one can enter into a bilateral commitment with business counterparts, whether it be a vendor, supplier, JV partner or any other counterpart to operate using the same principles. This agreement can be entered into independently or incorporated into the documentation of company’s existing contractual relationship.

31. The form of the Corporate Integrity Agreement provided is a tool for companies to help them to agree that it is a policy to engage in clean business relations with one another and the adherence to the terms of the agreement will not be monitored or tracked by any regulatory authority or agency. Once entered into, the terms of the agreement are between the two signatories and are given the same force as with any other contractual term. Any sanctions or provisions for breach of those terms, if any, will be a matter to be determined by the parties in their actual contractual documentation. The Corporate Integrity Agreement is available for download at the CISM website.

IMPLEMENTATION BENEFITS

32. The company will be making a clear stand of how it operates. This will be locked down in writing and will be a guidance to the company in its business interactions, should it be faced with the possibility of condoning any payments or other activities that would amount to corruption.
33. The company can use this pledge to set itself apart from its peers by demonstrating to its stakeholders that its business operations do not include any hidden risks or costs that are associated with corrupt activities demonstrating its commitment towards accountability and transparency which will improve the effectiveness and ethical reputation of the company.
34. Positive impacts of signing the CIP and implementing the Corporate Integrity System Assessment and Questionnaire are associated with higher economic growth, greater productivity and higher GDP ratios¹¹. The confidence level of domestic and foreign investors will increase which will help companies to achieve sustained economic growth and long term prosperity.
35. By meeting the growing demand for reporting on non-financial matters from a wide range of stakeholders (from regulators to civil society), it will positively influence the company's reputation in the market place and society; hence stimulating multi stakeholder dialogue related to anti-corruption.
36. By signing the pledge, companies reflect their sincerity and commitment towards anti-corruption hence raising awareness among employees and provides a means of control and discipline for the management. Indirectly, it sends a clear signal to the employees that the companies are serious in combating corruption.



¹¹ Transparency International Policy Position #04/2009

CORPORATE INTEGRITY ROUNDTABLE MEMBERS



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SSM: CORPORATE RESPONSIBILITY AGENDA
Driving Business Beyond Profitability

REGISTRAR OF COMPANIES/BUSINESSES
COMPANIES COMMISSION OF MALAYSIA
27 JANUARY 2012

NOTE:

This BPPC serves as a general guidance and does not create any legal obligation for companies and businesses to comply and merely outlines the best practices to be adopted at the option of such companies/businesses. SSM encourages the adoption of this BPPC towards ensuring business sustainability.

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